

**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION**

**THE NOCO COMPANY**  
30339 DIAMOND PARKWAY, #102  
GLENWILLOW, OHIO 44139

**Plaintiff**

**v.**

**JOHN DOE D/B/A HEBRON STORES  
AND HEBRON AUTO PARTS**  
75 EXECUTIVE DRIVE  
AURORA, ILLINOIS 60564

**Defendant**

**CASE NO. 1:19-cv-02260-DCN**

**DECLARATION OF ARUN MATHEWS**

I, Arun Mathews, declare as follows:

1. I am the founder and CEO of Hebron Consumer Products Corporation ("Hebron"). Hebron is an online retailer of automotive and plumbing parts and components selling through its own websites like [www.mytanklesswaterheaterstore.com](http://www.mytanklesswaterheaterstore.com) and [www.my12voltstore.com](http://www.my12voltstore.com). Hebron also sells certain products through third party platforms such as eBay, Amazon, and WalMart.
2. Hebron is incorporated under the laws of the State of Illinois with its headquarters and principal place of business located at 75 Executive Drive, Aurora, Illinois.
3. All of Hebron's officers and employees are located in Illinois and Hebron has no facilities or operations in Ohio.
4. Hebron does not own and has never owned real property or bank accounts in Ohio, does not have and has not ever had employees in Ohio, and is not and has not been registered to do business in Ohio.

5. Hebron does not specifically target and has never specifically targeted Ohio residents in connection with its products or advertising.
6. Hebron has never filed an annual tax return in Ohio.
7. Hebron officers and employees have never visited Ohio to conduct business for Hebron.
8. Hebron's suppliers for the Noco products at issue are not located in Ohio.
9. Hebron has stopped selling the Noco products at issue in the lawsuit and made a total of only 50 sales for a profit of approximately \$900 nationwide.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on December 11, 2019



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Arun Mathews